

**Federal Defenders  
OF NEW YORK, INC.**

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Southern District of New York  
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September 1, 2021

**BY ECF**

Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Malik Sanchez,  
21 Cr. 269 (CM)**

Dear Judge McMahon:

I write to request that the Court modify Malik Sanchez's bail conditions to enable him to participate in a GED and work readiness program through Opportunities for a Better Tomorrow ("OBT"). OBT has accepted Mr. Sanchez into its program, with classes to begin on September 13. See **Exhibit A** (OBT Letter).

A bail modification is needed because OBT class meetings are being conducted virtually in light of the pandemic. Mr. Sanchez is presently allowed to use the internet only for communications with counsel, mental health counselors, and Pretrial Services. Mindful of Mr. Sanchez's bail conditions, OBT proposes to have him come to the OBT offices in Sunset Park, Brooklyn, to access the internet under the supervision of OBT staff for class work only. I request that the Court modify Mr. Sanchez's bail conditions to permit him to access the internet under these conditions.

Pretrial Services consents to this request. The government defers to Pretrial Services.

Respectfully submitted,

/s/

Clay H. Kaminsky  
Assistant Federal Defender  
(212) 417-8749 / (646) 842-2622

cc: AUSA Kaylan Lasky  
USPSO Jonathan Lettieri (by email)

# EXHIBIT A



September 1, 2021

**Sunset Park**

882 3<sup>rd</sup> Ave  
Suite 10-10NE, Unit 18  
Brooklyn, NY 11232  
P: 718-369-0303  
F: 718-369-1518

**Bushwick**

25 Thornton Street  
Brooklyn, NY 11206  
P: 718-387-1600  
F: 718-387-5005

**Jamaica**

168-25 Jamaica Avenue  
Suite 202  
Jamaica, NY 11432  
P: 718-526-2984  
F: 212-202-6456

**Innovation Lab**

87 35<sup>th</sup> Street  
2<sup>nd</sup> Floor  
Brooklyn, NY 11232  
P: 718-801-8970

info@obtjobs.org  
www.obtjobs.org

To Whom It May Concern:

This letter is to verify that Malik Sanchez (DOB 11/20/2001) has enrolled in the Train & Earn program at Opportunities for a Better Tomorrow. The Train & Earn program is a work readiness program that also incorporates TASC exam preparation courses for students who are in need of their High School Equivalency Diploma.

Malik will begin classes on September 13, 2021 and complete the Train & Earn program on November 5, 2021. His class schedule will be Monday through Thursday from 9:30-11:45am, with office hours for individual instructors offered by appointment on Fridays from 9:30am-11:45am. Malik will be taking classes in Math, ELA (Reading and Writing), Career Readiness, and Credentials/Financial Literacy. At the end of the Train & Earn program, Malik will have a completed work readiness portfolio (including a resume, cover letter, thank you letter, and resignation letter) and will have had the opportunity to earn a credential in Customer Service from the National Retail Federation. At that point, he will also be eligible to obtain a paid internship at \$15/hour for 175 hours to help him develop his professional skills and experience.

Given the risks posed by Covid-19 and its variants, all of OBT's Train & Earn classes will be conducted virtually using Zoom for class meetings and Google Classroom for assignments. Malik will be able to log into his classes at the OBT offices in Sunset Park, Brooklyn. Either myself or Jessica Cuttone, Program Director, will be present with Malik during his time in the office to ensure that he is only using internet access to log into Zoom and Google Classroom in order to attend classes and complete any necessary coursework.

After November 5, 2021, OBT will then facilitate enrollment for Malik in Pathways to Graduation, a Department of Education program that provides free classes to help students earn their High School Equivalency Diploma. At this point Malik will begin an 8-week blended learning model with in-person Social Studies and Science administered by DOE instructors and continued Zoom-based Math and ELA administered by OBT instructors, with continued use of Google Classroom in all classes. Malik will continue to access his classes and assignments through Zoom and Google Classroom from OBT's Sunset Park office with staff supervision from myself, Ms. Cuttone, and/or DOE staff. Malik's daily schedule will be Monday through Friday from 9:00am-12:50pm and Friday from 9:00am-12:30pm.

If you have any questions or would like to discuss anything further, please feel free to reach out to me at [swhitman-salkin@obtjobs.org](mailto:swhitman-salkin@obtjobs.org) or at 551-299-2188.

Sincerely,

Sarah Whitman-Salkin, LMSW  
Social Worker